

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

**S.T.,**

Plaintiff,

v.

**CARSON LOOP ESM, LLC d/b/a  
BUDGETEL, and  
SRINIVAS BOLLEPALLI,**

Defendants.

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CASE NO. 4:24-CV-00225-WMR

**CONSENT MOTION TO EXTEND DISCOVERY**

COME NOW, **S.T., CARSON LOOP ESM, LLC d/b/a BUDGETEL** and **SRINIVAS BOLLEPALLI** (“the Parties”), and jointly and by consent, respectfully request that discovery in this matter be extended four (4) months, in support of which the Parties show the following:

This matter is currently in its initial discovery period under the Joint Preliminary Report and Discovery Plan and the Court’s Scheduling Order, which period ends July 11, 2025. (D.E. 25). The Parties have diligently pursued written discovery, the deposition of Defendant Srinivas Bollepalli has been reset for July 22, 2025, and Plaintiff has recently moved for leave to file an Amended Complaint, to which Defendants have no objection. (D.E. 40, D.E., 42). Counsel for the Parties have agreed to conduct discovery in parallel across this case and *A.H. v. Carson Loop ESM, LLC d/b/a Budgetel, and Srinivas Bollepalli*, 4:42-CV-00224, given the commonality of allegations, the criminal investigation of a critical common witness,

and the identity of the Defendants. (D.E. 25). And, the Parties agreed in their Joint Preliminary Report and Discovery Plan “to submit an initial consent motion to extend discovery at or near the expiration of the six-month discovery period as circumstances may warrant.” (D.E. 25).

There is an unusual volume of critical evidence in the hands of third parties, such as the criminal investigation file and documents held by the United States Department of Justice related to the investigation of a central witness, Shreesh Tiwari (which the Parties received for the first time in June, 2025, following Plaintiff’s Touhy request).

For these reasons, the Parties respectfully submit that circumstances warrant an extension of discovery, and request that the Court extend discovery four (4) months, that is to November 11, 2025, with dispositive motions or a consolidated pretrial order to be due 30 days thereafter.

Respectfully submitted this 11th day of July, 2025.

**CARR ALLISON**

/s/ Sean W. Martin

Sean W. Martin

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**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D), I hereby certify the foregoing document complies with the font and point selections permitted by Local Rule 5.1(B). This document was prepared on a computer using Times New Roman font in 14 point.

This 11th day of July, 2025.

By: /s/ Sean W. Martin

**SEAN W. MARTIN, GA BAR #474125**

**STEPHEN A. SWANSON, GA BAR #759751**

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CASE NO. 4:24-CV-00225-WMR

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a true and correct copy of the foregoing ***Consent Motion to Extend Discovery*** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to:

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This 11th day of July, 2025.

**CARR ALLISON**

/s/ Sean W. Martin

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